

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION and NOKIA,
INC.,

Plaintiffs,

v.

INTERDIGITAL COMMUNICATIONS
CORPORATION and INTERDIGITAL
TECHNOLOGY CORPORATION,

Defendants.

C.A. No. 05-16-JJF

**DECLARATION OF VIPUL MEHROTRA IN SUPPORT OF NOKIA'S
OPPOSITION TO INTERDIGITAL'S MOTION TO DISMISS**

Pursuant to 28 U.S.C. § 1746, I, Vipul Mehrotra, declare and say as follows:

1. My name is Vipul Mehrotra. I presently hold the title Director of Technology and Portfolio Management for Customer and Market Operations Group, for Nokia, Inc. in Dallas, Texas.

2. I make this declaration in support of Nokia's Opposition to Defendants' Motion To Dismiss Pursuant to Federal Rules of Civil Procedure 12(B)(1), 12(B)(6) and 12(H)(3). Except as otherwise stated, I have personal knowledge of the facts set forth in this declaration.

3G Wireless Standards

3. There are two 3G wireless standards that will be used in the United States after 2006: Wideband Code Division Multiple Access ("WCDMA") and CDMA2000. Both these standards are being used today in the United States.

4. WCDMA is also sometimes called Universal Mobile Telecommunications System or UMTS.

The WCDMA Standard in the United States

5. In the United States, at least one major wireless carrier has announced plans to deploy a commercial WCDMA network. That carrier is Cingular Wireless LLC ("Cingular").

6. Cingular is currently in the process of adding WCDMA to its current network. It currently has at least six markets in which a WCDMA network has been deployed and has announced plans to deploy WCDMA in additional markets.

7. Cingular has announced that it has entered into infrastructure contracts to deploy WCDMA in the major metropolitan U.S. markets by the end of 2005 with additional WCDMA deployments in 2006. A true and correct copy of Cingular's press release regarding these deployments is attached hereto as Exhibit A.

Nokia's WCDMA Products

8. Nokia has agreements with leading GSM and WCDMA wireless providers that govern the sale of standards-compliant phones. At least one of these agreements extends beyond 2006.

9. Nokia currently offers for sale both infrastructure products and handsets compatible with the WCDMA standard and will continue to offer WCDMA compliant products after 2006.

10. Nokia's WCDMA solution has already been deployed in over 20 locations worldwide.

11. Nokia has already entered into commitments to provide WCDMA phones to Cingular. A true and correct copy of a press release regarding once such commitment is attached hereto as *Exhibit B*.

12. Nokia markets its WCDMA products in a variety of ways, including on its website, www.nokia.com, and in printed literature. Examples of such advertisements are attached hereto as Exhibits C through G.

13. Nokia currently has a High Speed Downlink Packet Access (HSDPA) *solution that it offers and markets to wireless providers and will continue to offer and market after 2006*. Examples of Nokia's HSDPA marketing materials are attached hereto as Exhibit H-I.

14. To design and build a commercial WCDMA handset requires approximately one to two years, depending on the complexity, from when the relevant *standard is finalized*. Thus, if Nokia were to change its handset design and operation, such changes would not likely appear in commercial products for at least a year.

The CDMA2000 Standard in the United States

15. In the United States, the top two CDMA2000 wireless providers are expected to be Verizon Wireless and Sprint.

16. Verizon has rolled out an EV-DO network in approximately thirty of the largest United States metropolitan areas and is in the process of upgrading the remainder of its network from 1x to EV-DO service. A true and correct copy of a Verizon press release regarding the status of its EV-DO deployment plans is attached as Exhibit J.

17. Sprint has currently installed a 1x network. Sprint is in the process of upgrading major U.S. metropolitan areas to an EV-DO network in 2005 followed up by

an expansion to the remainder of the Sprint network through the end of 2006. A true and correct copy of a Sprint press release regarding the status of its EV-DO deployment plans is attached as Exhibit K.

18. Neither Sprint nor Verizon have announced plans to implement EV-DV service at this time.

19. In addition to Verizon Wireless and Sprint, there are a number of other wireless providers in the United States that will likely deploy CDMA2000 EV-DO or EV-DV networks by the end of 2006.

Nokia's CDMA2000 Products

20. Nokia markets and sells CDMA2000 phones. Examples of advertisements for such phones are attached hereto as exhibits L-M.

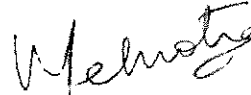
21. Nokia is currently working on a CDMA2000 EV-DO handset portfolio. Nokia expects to make its EV-DO phones commercially available at least as early as the end of 2006.

22. Nokia has designed a CDMA2000 EV-DV chipset. Chipsets control the fundamental operation of a handset. EV-DV compatible phones sold by Nokia would be based on this chipset.

23. To design and build a commercial CDMA2000 handset requires approximately one to two years, depending on complexity, from when the relevant standard is finalized. Thus, if Nokia were to change its handset design and operation, such changes would not likely appear in commercial products for at least one year.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of April, 2005.



VIPUL MEHROTRA

CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on April 28, 2005 I electronically filed Declaration of Vipul Mehrotra in Support of Nokia's Opposition to Interdigital's Motion to Dismiss with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Richard L. Horwitz
Potter Anderson & Corroon LLP
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I also certify that copies were caused to be served on April 28, 2005 upon the following in the manner indicated:

BY HAND

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